

## Exhibit 4

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

VIKTOR BORISOVICH NETYKSHO,  
BORIS ALEKSEYEVICH ANTONOV,  
DMITRIY SERGEYEVICH BADIN,  
IVAN SERGEYEVICH YERMAKOV,  
ALEKSEY VIKTOROVICH  
LUKASHEV,  
SERGEY ALEKSANDROVICH  
MORGACHEV,  
NIKOLAY YURYEVICH KOZACHEK,  
PAVEL VYACHESLAVOVICH  
YERSHOV,  
ARTEM ANDREYEVICH  
MALYSHEV,  
ALEKSANDR VLADIMIROVICH  
OSADCHUK,  
ALEKSEY ALEKSANDROVICH  
POTEMKIN, and  
ANATOLIY SERGEYEVICH  
KOVALEV,

Defendants.

CRIMINAL NO.

(18 U.S.C. §§ 2, 371, 1030, 1028A, 1956,  
and 3551 et seq.)

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**INDICTMENT**

The Grand Jury for the District of Columbia charges:

**COUNT ONE**

**(Conspiracy to Commit an Offense Against the United States)**

1. In or around 2016, the Russian Federation (“Russia”) operated a military intelligence agency called the Main Intelligence Directorate of the General Staff (“GRU”). The GRU had multiple units, including Units 26165 and 74455, engaged in cyber operations that involved the staged releases of documents stolen through computer intrusions. These units conducted large-scale cyber operations to interfere with the 2016 U.S. presidential election.

2. Defendants VIKTOR BORISOVICH NETYKSHO, BORIS ALEKSEYEVICH ANTONOV, DMITRIY SERGEYEVICH BADIN, IVAN SERGEYEVICH YERMAKOV, ALEKSEY VIKTOROVICH LUKASHEV, SERGEY ALEKSANDROVICH MORGACHEV, NIKOLAY YURYEVICH KOZACHEK, PAVEL VYACHESLAVOVICH YERSHOV, ARTEM ANDREYEVICH MALYSHEV, ALEKSANDR VLADIMIROVICH OSADCHUK, and ALEKSEY ALEKSANDROVICH POTEMKIN were GRU officers who knowingly and intentionally conspired with each other, and with persons known and unknown to the Grand Jury (collectively the “Conspirators”), to gain unauthorized access (to “hack”) into the computers of U.S. persons and entities involved in the 2016 U.S. presidential election, steal documents from those computers, and stage releases of the stolen documents to interfere with the 2016 U.S. presidential election.

3. Starting in at least March 2016, the Conspirators used a variety of means to hack the email accounts of volunteers and employees of the U.S. presidential campaign of Hillary Clinton (the “Clinton Campaign”), including the email account of the Clinton Campaign’s chairman.

4. By in or around April 2016, the Conspirators also hacked into the computer networks of the Democratic Congressional Campaign Committee (“DCCC”) and the Democratic National Committee (“DNC”). The Conspirators covertly monitored the computers of dozens of DCCC and DNC employees, implanted hundreds of files containing malicious computer code (“malware”), and stole emails and other documents from the DCCC and DNC.

5. By in or around April 2016, the Conspirators began to plan the release of materials stolen from the Clinton Campaign, DCCC, and DNC.

6. Beginning in or around June 2016, the Conspirators staged and released tens of thousands of the stolen emails and documents. They did so using fictitious online personas, including